My name is Brenda McCombs and I am the instructional technology director for Kannapolis City Schools in Kannapolis, NC. I am writing to you about the e-rate NPRM, proceeding 13-184. This is the first time I've responded to the FCC about erate, but after working with erate for 14 years, I feel I may have something to contribute to the possible changes that are being discussed.

First, I would like to say the technology infrastructure in our schools has improved vastly because of erate funding. We would not have been able to afford the switching equipment, bandwidth, and IP telephony without erate discounts. Our students have benefited greatly by the primary resources they are able to access and the distance learning classes they've been able to attend because of erate funded equipment and internet access. Our students would not have email accounts that are filtered and monitored without erate reimbursement; we simply could not afford it. Intermediate and middle school students use these accounts to do world-wide projects and turn in their homework assignments to their instructors. We also are appreciative that web-hosting is an allowed service. We've tried numerous free web-hosting services but the result (unless you already have strong web-designer skills) looks amateurish at best. Using a paid service gives our school's website a professional branding that we cannot achieve on our own.

So that's what I like about erate. Here's what needs improving. There are several things that make the current e-rate procedure difficult. The process for obtaining erate funds is cumbersome, confusing, and time-consuming. Instead, I would like to see the FCC set eligible funds to be allocated to schools in block grants. Priority #1 funds would be calculated by a blanket percentage discount based on NSLP enrollment. Priority #2 funds would be a fixed amount calculated by NSLP enrollment. Funds could only be spent on digital technology but the minute details would be up to the school to determine. Wireless 'hot spots' throughout the community for students to access need to be available in one community but may not make sense in another. The only form filed would be an annual reporting at the end of the funding year, listing how the monies had been spent that year. Library funding would be based upon NSLP percentages for the school district in the area their physical library branch is located.

Another problem with erate is keeping years of paperwork on file. I understand keeping some documentation and records, but five years is gracious plenty! I have file cabinets full of applications, quotes, RFPs, PIA review documentation, and other erate forms and have very little storage space in my office. Requiring me to keep five more years of paperwork becomes not only burdensome but also a fire hazard! Instead of increasing the document requirements for erate, I suggest slimming down the requirements for what must be kept and leaving the time limit at 5 years.

My final problem with erate is it difficult to plan a technology project with the current 'maybe' or 'whenever' wave schedule of funding. I THINK we'll be getting funded but I can't tell either my finance department or the technology staff when to plan to implement our proposed project. Do we need to plan for funds for this year 's or next year's budget to pay our required percentage? Do we schedule IT staff for April? June? or September of the following year when we're already planning for next year's projects? It would make more sense to either do block funding that is available on a certain date for everyone, or release waves to regions of the country during pre-determined months. For example, North Eastern states get funds each year in May and South Eastern states get funds in June, etc. It would also be helpful to have an online form to submit when a project is finished so remaining funds could be re-allocated to other needy schools.

Thank you for giving me the opportunity to voice my opinion on the future of erate funding. I'll be looking forward to seeing improvements soon.